

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION**

**MDL No. 2738 (FLW) (LHG)**

*This document relates to:*

**NOTICE OF OMNIBUS MOTION  
FOR SUMMARY JUDGMENT**

*Carol J. Williams, et al.,  
No. 3:19-cv-18778*

*Linda H. Hill, No. 3:18-cv-08344*

*Bobbie N. Landreth,  
No. 3:17-cv-11788*

*Michael Scroggins o/b/o Bertha M.  
Walton, No. 3:18-cv-12766*

**PLEASE TAKE NOTICE** that on a date and time convenient for the Court as counsel may be heard, Faegre Drinker Biddle & Reath LLP, counsel for defendants Johnson & Johnson and Johnson & Johnson Consumer Inc. (collectively the “JJCI Defendants”), will move before Chief Judge Freda L. Wolfson, U.S.D.J., in the United States District Court for the District of New Jersey, for an Order for Summary Judgment in favor of the JJCI Defendants and dismissing Plaintiffs Carol J. Williams, Linda H. Hill, Bobbie N. Landreth, and Michael Scroggins on behalf of Bertha M. Walton’s Complaints with prejudice. In support of this application, the

JJCI Defendants will rely on the attached Brief in Support of Motion for Summary Judgment, Statement of Undisputed Material Facts, Declaration of Jessica L. Brennan, Esq. and attached exhibits, and Declaration of Kathleen Frazier, Esq. and attached exhibits, submitted herewith.

Respectfully submitted,

s/Susan M. Sharko  
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Johnson and Johnson & Johnson  
Consumer Inc.*

Dated: June 18, 2021